

1 Sarah E. Piepmeier, Bar No. 227094  
SPiepmeier@perkinscoie.com  
2 Elise Edlin, Bar No. 293756  
EEdlin@perkinscoie.com  
3 PERKINS COIE LLP  
505 Howard Street, Suite 1000  
4 San Francisco, California 94105  
Telephone: +1.415.344.7000  
5 Facsimile: +1.415.344.7050

6 [Additional counsel listed on signature page]

7 *Attorneys for Defendant*  
8 *NETFLIX, INC.*

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 LAURI VALJAKKA,

12 *Plaintiff,*

13 v.

14 NETFLIX, INC.,

15 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF ELISE EDLIN IN  
SUPPORT OF DEFENDANT NETFLIX,  
INC.'S ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL  
[DKT. 178]**

Judge: Hon. Jon S. Tigar

1 I, Elise Edlin, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco,  
3 California, and counsel representing Defendant Netflix, Inc. I have personal knowledge of the  
4 facts set forth in this declaration and am competent to testify.

5 2. Pursuant to Civil L.R. 79-5(e), I make this declaration in support of Netflix's  
6 Administrative Motion to File Documents Under Seal Pursuant to Civil L.R. 79-5  
7 ("Administrative Motion") (Dkt. 178) to establish that certain documents contain material that  
8 discusses Netflix's confidential business practices and finances, and has been designated by  
9 Netflix as Protected Material as defined by § 2(f) of the Stipulated Protective Order for Litigation  
10 Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (Dkt. No. 56)  
11 ("Protective Order").

12 3. On October 10, 2023, the Court issued an Order denying Netflix's Administrative  
13 Motion to seal Exhibits B, D, E, and F attached to the Declaration of Angela Griggs in Support of  
14 Netflix's Motion to Exclude Portions of the Opinions and Testimony of Robert Held ("Griggs  
15 Declaration"), because Netflix had "not explained why a more narrowly tailored redaction ... is  
16 not possible."

17 4. Dkt. 178-4, Exhibit B of the Griggs declaration, which is the rough deposition  
18 transcript of Dr. Tibor Kozek does not contain any information that needs to be sealed and can be  
19 filed publicly.

20 5. Dkt. 178-6, Exhibit D of the Griggs declaration with narrowly tailored redactions  
21 as indicated in the table below. This exhibit is excerpts of the deposition transcript of Robert F.  
22 Held. The designated portions of the exhibit contain Netflix highly confidential company  
23 information related to Netflix's financials. Netflix would be adversely affected if this information  
24 were to be made public.

25 6. Dkt. 178-7, Exhibit E of the Griggs declaration with narrowly tailored redactions  
26 as indicated in the table below. This exhibit is excerpts of the deposition transcript of Helen  
27 Ponce. The designated portions of the exhibit contain Netflix highly confidential company  
28

information including Netflix's confidential business practices and non-public financial data. Netflix would be adversely affected if this information were to be made public.

7. Dkt. 178-8, Exhibit F of the Griggs declaration with narrowly tailored redactions as indicated in the table below. This exhibit is excerpts of the rough deposition transcript of Nisha Mody. The designated portions of the exhibit contain Netflix highly confidential company information related to Netflix's financials. Netflix would be adversely affected if this information were to be made public.

Document	Entirety or Redacted	Basis for Request to File Under Seal
Exhibit B Dkt. 178-4	Public	Public document
Exhibit D Dkt. 178-6	25:6; 26:13; 26:19; 144:21-23; 146:4-5; 146: 9-10; 150:1-5; 150:17; 211:24-25; 212:16-17; 212:19; 214:13; and 267:16	Exhibit D is a confidential deposition transcript of an Valjakka's damages expert.  The identified portions of this document contain highly confidential information related to Netflix's financials, and is thus being filed under seal.  Netflix respectfully requests that Exhibit D be filed under seal.
Exhibit E Dkt. 178-7	27:1-9; 48:20; 56:1; 56:13; 56:15-17; and 56:22-23.	Exhibit E is a confidential deposition transcript of Netflix's Senior Director and Corporate Controller.  This document was designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Netflix pursuant to the parties' Stipulated Protective Order and is thus being filed under seal. The identified portions contain highly confidential information related to Netflix's financials.  Netflix respectfully requests that Exhibit E be filed under seal.
Exhibit F Dkt. 178-8	78:9; 78:11; 78:14; and	Exhibit F is a confidential deposition transcript of Netflix's damages expert.

1		78:17.	This document contains highly confidential
2			company information related to Netflix's
3			financials, and is thus being filed under seal.
4			Netflix respectfully requests that Exhibit F be filed
			under seal.

5 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
6 and correct to the best of my knowledge.

7 Executed on October 13, 2023 in Oakland, California.

8  
9 /s/ Elise Edlin  
Elise Edlin